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17 UNITED STATES DISTRICT COURT  
18 DISTRICT OF NEVADA  
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20 CHRISTIAN J. MILLETTE,

21 Civil No. 2:24-cv-00160-DJA

22 Plaintiff,

23 vs.

24 MARTIN O'MALLEY, Commissioner  
25 of Social Security,

UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE ANSWERING BRIEF (*FIRST  
REQUEST*)

Defendant.

26  
27 Defendant, Martin O'Malley, Commissioner of Social Security (the "Commissioner"), by  
28 and through his undersigned attorneys, hereby moves for a 13-day extension of time to file his  
29 response to Plaintiff's opening brief. The answering brief is due to be filed by May 24, 2024.  
30 This is the Commissioner's first request for an extension of time to file the response.

31 Defendant submits that good cause exists for this extension request because the attorney

1 tasked with writing the response has several successive deadlines through the next two weeks,  
2 many of which have already been extended past their original deadlines, and needs sufficient  
3 time to review the record, evaluate the issues raised in Plaintiff's opening brief, and prepare  
4 Defendant's response. Defendant's counsel will endeavor to complete these tasks as soon as  
5 possible. This request is made in good faith and with no intention to unduly delay the  
6 proceedings, and counsel apologizes for any inconvenience. Accordingly, Defendant requests an  
7 extension in which to respond to file the response until June 6, 2024.

8 The undersigned conferred with Plaintiff's counsel, who confirmed on May 20, 2024,  
9 that Plaintiff has no objection to the requested extension.

10 It is therefore respectfully requested that Defendant be granted an extension of time to  
12 file the response to Plaintiff's motion to remand, through and including June 6, 2024.

13 DATED May 20, 2024

14 Respectfully submitted,

15 JASON M. FRIERSON  
United States Attorney

16 By: s/ Michonne L. Omo  
17 MICHONNE L. OMO  
18 Special Assistant United States Attorney  
Office of Program Litigation, Office 7

19 Attorneys for Defendant

21 IT IS SO ORDERED:

22   
23 United States MAGISTRATE JUDGE

24 DATED: 5/21/2024